UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW LEDSEY		
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Proposed Co-Counsel for the Official	Proposed Co-Counsel for the Official Committee	
Committee of Talc Claimants	of Talc Claimants	
In re:	Chapter 11	
LTL MANAGEMENT, LLC, ¹	Case No.: 23-12825 (MBK)	
Debtor.	Honorable Michael B. Kaplan	

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

CERTIFICATION IN SUPPORT OF APPLICATION FOR RETENTION OF PROFESSIONAL, OTTERBOURG P.C., EFFECTIVE AS OF APRIL 14, 2023

- I, Melanie L. Cyganowski, being of full age, certify as follows:
- 1. I am seeking authorization on behalf of Otterbourg P.C. ("Otterbourg") to be retained as co-counsel to the Official Committee of Talc Claimants (the "Committee") for LTL Management LLC (the "Debtor") in the above-captioned case ("Case"), effective as of April 14, 2023, the date on which the Committee selected Otterbourg to serve as its co-counsel and the date on which Otterbourg commenced providing legal services to the Committee.
- 2. My professional credentials include: I am an attorney at law in good standing of the bar of the State of New York and am admitted to practice in, among other courts, the courts of the State of New York, the United States Supreme Court, the Courts of Appeals for the Second and Third Circuits, and the United States District Courts for the Eastern District of New York and Southern District of New York. I am the former Chief United States Bankruptcy Judge for the Eastern District of New York. An order for my admission *pro hac vice* was entered by the Court on November 30, 2021 in the Debtor's first bankruptcy case commenced on October 14, 2021, Case No. 21-30589 ("LTL I") [LTL I, Dkt. No. 572], and has since been reauthorized in this case [Dkt. No. 342].
- 3. I am a Member of the law firm of Otterbourg, which maintains an office at 230 Park Avenue, New York, New York 10169-0075.
- 4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

Subject to the Court's approval, and in accordance with section 330(a) of the Bankruptcy Code and any orders of the Court, Otterbourg will charge for its legal services as co-counsel to the Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect

on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith. The current hourly rates of Otterbourg professionals are in the following ranges:

Professional	Rate Per Hour
Members / Of Counsel	\$710 - \$1,620
Associates	\$325 – \$905
Paralegals	\$380

The hourly rates set forth above are Otterbourg's general hourly rates for work of this nature and are consistent with the customary compensation charged by comparably skilled attorneys at Otterbourg in similar matters, including non-bankruptcy matters. In the normal course of its business, Otterbourg revises its billing rates on an annual basis².

Otterbourg has advised the Committee that it intends to apply to the Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the applicable Bankruptcy Rules, the Local Rules, any orders establishing procedures for monthly compensation and reimbursement of expenses of professionals, and further orders of the Court. Otterbourg will maintain detailed records of fees and expenses incurred in connection with the rendering of the professional services described above, in accordance with applicable rules and guidelines.

Otterbourg has advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this application to retain Otterbourg and related

Pursuant to its ordinary practice, Otterbourg generally revises its rates as of October 1st of each year. At least ten (10) days before implementing any increases in Otterbourg's rates for professionals in this Case, Otterbourg shall file a supplemental affidavit with the Court explaining the basis for the rate increases in accordance with section 330 of the Bankruptcy Code. All parties in interest, including the U.S. Trustee, retain all rights to object to any rate increase on all grounds, including the reasonableness standard provided for in section 330 of the Bankruptcy Code.

documents, and the preparation of monthly, interim and final fee applications for Otterbourg. It will not bill for the defense of any fee applications, unless otherwise permitted by an order of the Court. Otterbourg will bill any non-working travel time at 50% of the actual time incurred.

In addition, Otterbourg requests that it be reimbursed for any actual and necessary expenses incurred in representing the Committee, including, but not limited to, business meals, photocopies, courier service, computer-assisted research, docket and court filing fees, mail and express mail charges, messenger charges, document processing, telecommunications, travel, court reporting charges, and any other non-ordinary overhead expense such as overtime for secretarial personnel and other staff and any other incidental costs advanced by Otterbourg specifically for the representation of the Committee, in a manner and at rates consistent with charges made generally to Otterbourg's other clients. Photocopies and similar copies will be billed at a reduced rate of \$0.10 per page.

Otterbourg has not agreed to share: (a) any compensation it may receive with another party or person, other than with the Members, Of Counsel, and associates of Otterbourg; or (b) any compensation another person or party has received or may receive in connection with this Case.

Otterbourg has not received a retainer in connection with this Case.

	Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of
	D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

	None
X	Describe connection:

In preparing this Certification, an attorney working under my supervision caused the implementation of certain procedures developed by Otterbourg to ensure full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules (collectively, the "Statutory Authority"). Pursuant to the Statutory Authority, to identify the parties relevant to this Certification and to ascertain Otterbourg's connections to certain parties, the Otterbourg attorney caused to be performed an examination and comparison of the known names included in the following categories of entities who may be parties in interest (collectively, the "Potentially Interested Parties") in this Case, including:

- (a) Members of the Committee;
- (b) The Debtor, direct equity, non-debtor affiliates, and direct non-debtor subsidiary;
- (c) Managers and officers of the Debtor;
- (d) Alleged major current business affiliations of the Debtor's Managers;
- (e) Depository and disbursement bank;
- (f) Alleged major sureties;
- (g) Alleged parties to the Debtor's material contracts;
- (h) Alleged significant co-defendants in talc-related litigation;
- (i) The Debtor's proposed professionals and claims agent;
- (j) The Debtor's proposed significant ordinary course professionals, consultants and service providers;
- (k) Known professionals for certain non-debtor parties in interest;
- (l) Proposed Future Claimants' Representative and her proposed professional;
- (m) Alleged material potentially indemnified parties;
- (n) Alleged parties who have entered into plan support agreements;
- (o) Law firms with significant representations of talc claimants;

- (p) Alleged key parties in *Imerys Talc America, Inc.* and *Cyprus Mines Corp.* chapter 11 cases;
- (q) The Debtor's alleged insurers;
- (r) Alleged potential parties in Canadian Proceeding;
- (s) Alleged States/Federal District with consumer protection investigations/actions;
- (t) Office of the United States Trustee for Region 3 District of New Jersey;
- (u) The Bankruptcy Judges for the District of New Jersey;
- (v) Alleged retailers and indemnified parties; and
- (w) Alleged top 30 law firms with the most significant representations of talc claimants

A copy of the list of the Potentially Interested Parties searched by Otterbourg is attached hereto as **Schedule 1**.

An attorney working under my supervision then caused a comparison of each of the Potentially Interested Parties to the names that Otterbourg has compiled into a computerized master client database, comprised of the names of current or former clients (the "Clients"), and the names of the parties that were related to or adverse to the Clients (the "Client Database").

A list of the Clients that are Potentially Interested Parties (the "Client Data List") is attached as **Schedule 2**. An inquiry was made, where appropriate, of the respective Otterbourg personnel responsible for the current or former matters to verify that Otterbourg does not represent or hold an interest adverse to the interests of the Debtor's estate with respect to any entity on the Client Data List in connection with the Debtor or this Case. In addition, a determination was made as to whether any of the entities on the Client Data List were former, rather than current, Clients.

I have reviewed the Client Data List, and have ascertained, to the best of my knowledge, that neither I nor any Member, "of counsel" or associate of Otterbourg currently represents

professionally or is associated with the Debtor, its creditors or any other Potentially Interested Parties, except to the extent set forth below and in Schedule 2.

Bank of America, N.A. ("BOA") is a current client of Otterbourg. BOA is not a creditor of the Debtor. In the *Declaration of John K. Kim in Support of First Day Pleadings* (the "First Day Declaration") [Dkt. No. 4], the Debtor states that it maintains a bank account at BOA in Charlotte, North Carolina. I understand from the First Day Declaration that the Debtor intends to direct all payments and other funds received by the Debtor into the BOA bank account, and for that bank account to serve as the Debtor's disbursement account. Otterbourg has not, does not and will not represent BOA in any matters related to this Case or to the Debtor. The attorneys at Otterbourg that provide services to BOA are not part of Otterbourg's bankruptcy department.

Further, with respect to the Client Data List, Otterbourg formerly represented an ad hoc group of certain tale claimants (the "Ad Hoc Group"), consisting of nine members of the official committee of tale claimants appointed in LTL I (the "TCC"): Alishia Landrum (represented by Beasley Allen Law Firm); Rebecca Love (represented by Ashcraft & Gerel, LLP); Blue Cross Blue Shield of Massachusetts; Tonya Whetsel (represented by Karst von Oiste LLP); Kristie Doyle (represented by Kazan, McClain, Satterley & Greenwood PLC); William A. Henry (represented by Levin Papantonio Rafferty); Randy Derouen (represented by Levy Konigsberg LLP); April Fair (represented by Robinson Calcagnie, Inc.); and Patricia Cook (represented by Weitz & Luxenberg, P.C.). As co-counsel to the Ad Hoc Group, the following documents were filed on behalf of the Ad Hoc Group: (i) an informational brief; (ii) an omnibus objection to the first day relief requested by the Debtor; and (iii) an objection to the Debtor's motion to seal certain exhibits related to the Debtor's complaint for injunctive relief. [Dkt. Nos. 79, 103; Adv. Pro. No. 23-01092, at Dkt. No. 27]. Upon the Committee's selection of Otterbourg as co-counsel in this Case on April 14, 2023,

Otterbourg immediately ceased its representation of the Ad Hoc Group. After the conclusion of its representation of the Ad Hoc Group, Otterbourg promptly commenced providing legal services to the Committee in this Case. Otterbourg received no retainer from or on behalf of the Ad Hoc Group for its services in connection with this Case.

Further, with respect to the Client Data List, Otterbourg formerly represented the Plaintiffs' Steering Committee (the "PSC") in the multi-district litigation of *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation* (MDL No. 2738) pending before the United States District Court for the District of New Jersey. The PSC was appointed on December 6, 2016, years prior to the commencement of LTL I (and this Case). Otterbourg was initially retained to represent the PSC in LTL I.³ By Order, entered on November 8, 2021, the United States Bankruptcy Court for the Western District of North Carolina approved the formation of the TCC, comprised of 11 members. [LTL I, Dkt. No. 355]. Following the appointment of that committee, Otterbourg was selected to serve as TCC's co-counsel and Otterbourg immediately ceased its representation of the PSC.

On December 23, 2021, the US Trustee reconstituted and amended the composition of the statutory committee into two official committees: Official Committee of Talc Claimants I ("<u>TCC II</u>") and Official Committee of Talc Claimants II ("<u>TCC II</u>"). TCC I was comprised of 9 members, of which 7 members were appointed to the originally appointed statutory committee and 2 members were newly appointed members. Effective April 12, 2022, the originally appointed statutory committee (*i.e.*, the TCC) was reinstated and Otterbourg was selected to serve as its co-

Otterbourg and the Beasley Allen Law Firm ("Beasley Allen"), one of the co-chairs of the PSC, entered into a retention agreement (the "Retention Agreement"). Shortly thereafter, on October 17, 2021, the PSC agreed to (a) retain Otterbourg as its counsel in LTL I, (b) assume the Retention Agreement, and (c) pay the fees and expenses required by the Retention Agreement. The total amount of fees received in connection with Otterbourg's representation of the PSC in LTL I was less than 1% of Otterbourg's gross revenue (based upon 2021/2022 gross numbers).

counsel in LTL I. On April 4, 2023, the Court entered its *Order (I) Dismissing Debtor's Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* (the "Dismissal Order") [LTL I, Dkt. No. 3938]. On April 4, 2023, LTL Management LLC (as the debtor in LTL I) filed its *Notice of Debtor's Intent Regarding Appeals* [LTL I, Dkt. No. 3939] confirming that it would not pursue the Appeals (as defined in the Dismissal Order), thereby resulting in the automatic dissolution of the TCC pursuant to the terms of the Dismissal Order⁴.

In accordance with the Court's *Order Establishing Procedures for Interim Compensation* and Reimbursement of Retained Professionals, dated December 9, 2021 (as modified by the Court's *Order Modifying Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals*, dated December 17, 2021) [LTL I, Dkt. Nos. 761, 870], and the *Order Appointing an Independent Fee Examiner and Establishing Procedures*, dated March 31, 2022 [LTL I, Dkt. No. 1922], Otterbourg submitted and filed monthly statements and applications for allowance of compensation and reimbursement of expenses in LTL I.

As of the Court's entry of the Dismissal Order on April 4, 2023, Otterbourg was owed \$752,734.54 for services rendered and expenses incurred in representing the TCC as its co-counsel in LTL I (the "Pre-Petition Balance"). On April 26, 2023, the Debtor filed a motion seeking the entry of an order authorizing it to satisfy its obligations under the Dismissal Order, including the final allowance of professional fees and expenses and the payment of such allowed fees and expenses (the "Obligations Motion"). [Dkt. No. 319]. Pending entry of an order approving the Obligations Motion, Otterbourg anticipates that the allowed amount of the Pre-Petition Balance

Under the terms of the Dismissal Order, the TCC remained in existence after the date of dismissal for the sole limited purpose of allowing the TCC to pursue or defend any Appeals (as defined in the Dismissal Order) with its Retained Professionals (as defined in the Dismissal Order and which included Otterbourg as co-counsel to the TCC) authorized to continue to perform services on the TCC's behalf.

will be paid in connection with LTL I.

Otterbourg has represented, currently represents, and may in the future represent certain parties-in-interest or potential parties-in-interest in this Case in other matters *unrelated* to the Debtor, this Case, or such entities' claims against the Debtor.

Otterbourg may have worked with professionals (*e.g.*, as co-counsel or adversaries) in other cases where those professionals represent Potentially Interested Parties in the case and may have represented official or informal committees in which the individual members may have an interest in this Case. Otterbourg also may represent financial institutions that may have been or are currently lenders to a Potential Party in Interest. As noted, however, Otterbourg has not and will not represent any clients in connection with this Case except for the Committee.

As a matter of disclosure, on June 14, 2022, the United States District Court for the Southern District of New York entered an order appointing me (Melanie L. Cyganowski) as the Receiver for StraightPath Venture Partners LLC, StraightPath Management LLC, SP Ventures Fund LLC, SP Ventures Fund 2 LLC, SP Ventures Fund 3 LLC, SP Ventures Fund 4 LLC, SP Ventures 5 LLC, SP Ventures 6 LLC, SP Ventures 7 LLC, SP Ventures 8 LLC, and SP Ventures 9 LLC (collectively, the "SP Receivership Entities") in an action (the "SEC Action") commenced by the Securities and Exchange Commission, styled Securities and Exchange Commission v. StraightPath Venture Partners LLC, et al., Case No. 1:22-cv-03897-LAK. To assist in the discharge of my duties as Receiver for the SP Receivership Entities, a motion was filed in the SEC Action for the entry of an order approving the retention of Berkeley Research Group, LLC ("BRG") as tax advisor to the Receiver, effective as of August 12, 2022. On September 7, 2022, an order was entered in the SEC Action approving that motion. In connection with the Debtor's first bankruptcy case, this Court entered an order authorizing Randi S. Ellis, the Legal

Representative for Future Talc Claimants, to retain BRG to provide expert consulting services and analysis of talc claim liability, effective as of July 1, 2022. [LTL I, Dkt. No. 2801]. According to the Debtor's *List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* filed in this Case on April 17, 2023 [Dkt. No. 207-1], BRG is identified as an alleged unsecured creditor.

In addition, it is possible that certain of the Members, "of counsel" and associates of Otterbourg and such persons' relatives may have familial or personal relationships, as well as business, contractual, or economic relationships, with officers, directors, and/or shareholders or creditors of the Debtor, competitors of the Debtor, other professionals engaged in this Case and/or other parties in interest in this Case. I have not been made aware of any material relationships with any such individual, except as follows:

(x) According to the resolutions (the "Resolutions") adopted on April 2, 2023 by the Debtor's board of managers (the "Board"), a copy of which is attached as Exhibit A to the Debtor's chapter 11 bankruptcy petition filed in this Case [Dkt. No. 1], the Board has authorized the Debtor's retention of certain law firms, including, for example, Skadden, Arps, Slate, Meagher & Flom LLP ("Skadden"), in connection with this Case. Otterbourg discloses that a Member of the Firm of Otterbourg has a spouse that is a Partner at Skadden. It is my understanding that the spouse at Skadden is not involved in this Case. Moreover, the relevant Otterbourg attorney has not and will not be involved in this Case in any way and has not and will not have access to the electronic files maintained by Otterbourg relating to its proposed retention by the Committee in this Case.

I am not related to and, to the best of my knowledge, no other attorney at Otterbourg is related to (a) any United States Bankruptcy Judge for the District of New Jersey or (b) the United States Trustee for Region 3, or any person employed in the office of the United States Trustee for Region 3.

If and to the extent Otterbourg has a conflict with respect to a particular client or matter, it is the Committee and Otterbourg's understanding that the Committee will utilize, subject to the

Court's approval, other counsel to represent the Committee's interest with respect to such client or matter.

For the reasons stated herein, based on the conflicts search conducted to date and described here, to the best of my knowledge Otterbourg is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and as used in section 328(c) of the Bankruptcy Code, and does not have an interest materially adverse to the interests of the Debtor's estate or any class of creditors or equity holders of the Debtor.

Otterbourg will promptly disclose and file a supplemental certification if any information is subsequently discovered that is pertinent to the statements and disclosures made herein.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

None

Describe connection:

See paragraph 5 above and Schedule 2 attached hereto.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

do not hold an adverse interest to the estate.

do not represent an adverse interest to the estate.

are disinterested under 11 U.S.C. § 101(14).

do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

Other. Explain:		
 =		

8. Description of Protocols to Avoid Unnecessary Duplicaion of Services:

In light of the size of this Case and scope of related litigation, the Committee determined it was in the talc claimants' best interest to retain multiple law firms. Each of the firms the Committee has proposed to retain serves a distinct purpose from the others:

- a. Brown Rudnick LLP serves as lead bankruptcy counsel, providing a deep bench of attorneys with core bankruptcy, bankruptcy litigation and mass tort bankruptcy experience.
- b. Otterbourg serves as lead mass tort/litigation counsel and special bankruptcy counsel, providing the unique perspective of a former bankruptcy chief judge and expertise in preliminary injunction and district court litigation.
- c. Massey & Gail LLP serves as special counsel, providing unparalleled mass tort and other complex case experience before trial and appellate courts, including the United States Supreme Court.
- d. Genova Burns LLC serves as local counsel, one of the few New Jersey firms with appropriate experience that is without conflicts in this Case.
- e. MoloLamken LLP serves as the Committee's special counsel for appeals. MoloLamken is a preeminent appellate firm with substantial experience before the highest courts in the country, as well as before the Third Circuit Court of Appeals in LTL I.

Additionally, co-counsel to the Committee has instituted the following multi-step system for efficiency purposes and in order to avoid unnecessary duplication of services:

- a. First, a small group of senior partners confer to determine strategy in consultation with Committee members and their designated representatives.
- b. Next, one firm is assigned primary responsibility for a task.
- c. Once a task has been preliminarily completed, it is reviewed by the other firms, allowing the firm to whom the task is assigned to benefit from the extensive knowledge and varying perspectives of co-counsel.
- d. Once co-counsel have signed off on a particular task, it is circulated to the Committee for review and comment.

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Otterbourg believes that the above protocol is consistent with effective management of assignments in a mega bankruptcy case as well as how such matters are handled by large law firms such as those sought to be retained by the Debtor and its affiliates in other bankruptcy cases.

I certify under penalty of perjury that the above information is true.

Date: May 2, 2023 /s/Melanie L. Cyganowski

Melanie L. Cyganowski

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Schedule 1

Potentially Interested Parties

Debtor

LTL Management LLC

Direct Equity Owner of Debtor

Johnson & Johnson Holdco (NA) Inc.

Debtor's Direct Non-Debtor Subsidiary

Royalty A&M LLC

Other Non-Debtor Affiliates

3Dintegrated ApS

ABD Holding Company, Inc.

ABIOMED R&D, Inc.

ABIOMED, Inc.

Acclarent, Inc.

Actelion Ltd

Actelion Pharmaceuticals Ltd

Actelion Pharmaceuticals Trading

(Shanghai) Co., Ltd.

Actelion Pharmaceuticals US, Inc.

Actelion Treasury Unlimited Company

Albany Street LLC

ALZA Corporation

Alza Land Management, Inc.

AMO (Hangzhou) Co., Ltd.

AMO (Shanghai) Medical Devices

Trading Co., Ltd.

AMO ASIA LIMITED

AMO Australia Pty Limited

AMO Canada Company

AMO Denmark ApS

AMO Development, LLC

AMO France

AMO Germany GmbH

AMO Groningen B.V.

AMO International Holdings

Unlimited Company

AMO Ireland

AMO Italy SRL

AMO Japan K.K.

AMO Manufacturing USA, LLC

AMO Netherlands BV

AMO Nominee Holdings, LLC

AMO Norway AS

AMO Puerto Rico Manufacturing, Inc.

AMO Sales and Service, Inc.

AMO Singapore Pte. Ltd.

AMO Spain Holdings, LLC

AMO Switzerland GmbH

AMO United Kingdom, Ltd.

AMO Uppsala AB

Anakuria Therapeutics, Inc.

AorTx, Inc.

Apsis SAS

Aragon Pharmaceuticals, Inc.

Asia Pacific Holdings, LLC

Atrionix, Inc.

AUB Holdings LLC

Auris Health, Inc.

Backsvalan 6 Handelsbolag

Beijing Dabao Cosmetics Co., Ltd.

BeneVir BioPharm, Inc.

Berna Rhein B.V.

BioMedical Enterprises, Inc.

Biosense Webster (Israel) Ltd.

Biosense Webster, Inc.

Breethe, Inc.

C Consumer Products Denmark ApS

Carlo Erba OTC S.r.l.

Centocor Biologics, LLC

Centocor Research & Development, Inc.

Cerenovus, Inc.

ChromaGenics B.V.

Ci:z. Labo Co., Ltd.

Cilag AG

Cilag GmbH International

Cilag Holding AG

Cilag Holding Treasury Unlimited Company

Cilag-Biotech, S.L.

Coherex Medical, Inc.

ColBar LifeScience Ltd.

Colbui Enescience E

Consumer Test Entity

Cordis de Mexico, S.A. de C.V.

Corimmun GmbH

CoTherix Inc.

CRES Holdings, Inc.

CrossRoads Extremity Systems, LLC

CSATS, Inc.

Debs-Vogue Corporation

(Proprietary) Limited

DePuy Hellas SA

DePuy International Limited

DePuy Ireland Unlimited Company

DePuy Mexico, S.A. de C.V.

DePuy Mitek, LLC

DePuy Orthopaedics, Inc.

DePuy Products, Inc.

DePuy Spine, LLC

DePuy Synthes Institute, LLC

DePuy Synthes Products, Inc.

DePuy Synthes Sales, Inc.

DePuy Synthes, Inc.

Dutch Holding LLC

ECL7, LLC

EES Holdings de Mexico,

S. de R.L. de C.V.

EES, S.A. de C.V.

EIT Emerging Implant Technologies GmbH

Ethicon Endo-Surgery (Europe) GmbH

Ethicon Endo-Surgery, Inc.

Ethicon Endo-Surgery, LLC

Ethicon LLC

Ethicon Sarl

Ethicon US, LLC

Ethicon Women's Health & Urology Sarl

Ethicon, Inc.

Ethnor (Proprietary) Limited

Ethnor del Istmo S.A.

Ethnor Farmaceutica, S.A.

Finsbury (Development) Limited

Finsbury (Instruments) Limited

Finsbury Medical Limited

Finsbury Orthopaedics International Limited

Finsbury Orthopaedics Limited

FMS Future Medical System SA

GATT Technologies B.V.

GH Biotech Holdings Limited

Global Investment Participation B.V.

GMED Healthcare BV

Guangzhou Bioseal Biotech Co., Ltd.

Hansen Medical Deutschland GmbH

Hansen Medical International, Inc.

Hansen Medical UK Limited

Hansen Medical, Inc.

Healthcare Services (Shanghai) Ltd.

I.D. Acquisition Corp.

Innomedic Gesellschaft fur innovative

Medizintechnik und Informatik mbH

J & J Company West Africa Limited

J&J Argentina S.A.

J&J Pension Trustees Limited

J&J Productos Medicos & Farmaceuticos

del Peru S.A.

J.C. General Services BV

Janssen Biologics (Ireland) Limited

Janssen Biologics B.V.

Janssen BioPharma, LLC

Janssen Biotech, Inc.

Janssen Cilag Farmaceutica S.A.

Janssen Cilag S.p.A.

Janssen Cilag SPA

Janssen Cilag, C.A.

Janssen Development Finance Unlimited

Company

Janssen Egypt LLC

Janssen Farmaceutica Portugal Lda

Janssen France Treasury Unlimited

Company

Janssen Global Services, LLC

Janssen Holding GmbH

Janssen Inc.

Janssen Irish Finance Unlimited Company

Janssen Japan Treasury Unlimited Company

Janssen Korea Ltd.

Janssen Mexico Treasury Unlimited

Company

Janssen Oncology, Inc.

Janssen Ortho LLC

Janssen Pharmaceutica (Proprietary)

Limited

Janssen Pharmaceutica NV

Janssen Pharmaceutica S.A.

Janssen Pharmaceutical K.K.

Janssen Pharmaceutical Sciences

Unlimited Company

Janssen Pharmaceutical Unlimited Company

Janssen Pharmaceuticals, Inc.

Janssen Products, LP

Janssen R&D Ireland Unlimited Company

Janssen Research & Development, LLC

Janssen Sciences Ireland Unlimited

Company

Janssen Scientific Affairs, LLC

Janssen Supply Group, LLC

Janssen Vaccines & Prevention B.V.

Janssen Vaccines Corp. JNTL (Middle East) HoldCo LLC Janssen-Cilag JNTL (Puerto Rico) HoldCo GmbH Janssen-Cilag (New Zealand) Limited JNTL (Shanghai) Investment Co., Ltd. Janssen-Cilag A/S JNTL (Switzerland) HoldCo GmbH Janssen-Cilag AG JNTL (Thailand) HoldCo LLC Janssen-Cilag Aktiebolag JNTL (UK) HoldCo Limited Janssen-Cilag AS JNTL Consumer Health (Belgium) BV Janssen-Cilag B.V. JNTL Consumer Health (Brazil) Ltda. Janssen-Cilag d.o.o. Beograd JNTL Consumer Health Janssen-Cilag de Mexico S. de R.L. de C.V. (Czech Republic) s.r.o. Janssen-Cilag Farmaceutica Lda. JNTL Consumer Health Janssen-Cilag Farmaceutica Ltda. (Dominican Republic), S.A.S. Janssen-Cilag GmbH JNTL Consumer Health (Finland) Oy Janssen-Cilag International NV JNTL Consumer Health (France) SAS Janssen-Cilag Kft. JNTL Consumer Health (Hungary) Kft Janssen-Cilag Limited JNTL Consumer Health (India) Janssen-Cilag Manufacturing, LLC **Private Limited** Janssen-Cilag NV JNTL Consumer Health Janssen-Cilag OY (New Zealand) Limited Janssen-Cilag Pharma GmbH JNTL Consumer Health (Norway) AS Janssen-Cilag Pharmaceutical S.A.C.I. JNTL Consumer Health (Philippines) Inc. Janssen-Cilag Polska, Sp. z o.o. JNTL Consumer Health (Poland) sp. z o.o. Janssen-Cilag Pty Ltd JNTL Consumer Health (Portugal) Limitada Janssen-Cilag S.A. JNTL Consumer Health (Services) LLC Janssen-Cilag s.r.o. JNTL Consumer Health (Slovakia), s.r.o. Janssen-Cilag, S.A. JNTL Consumer Health (Spain), S.L. Janssen-Cilag, S.A. de C.V. JNTL Consumer Health (Taiwan) Limited JNTL Consumer Health (Vietnam) Co. Ltd. Janssen-Pharma, S.L. J-C Health Care Ltd. JNTL Consumer Health General Jevco Holding, Inc. Services BV JJ Surgical Vision Spain, S.L. JNTL Consumer Health I (Ireland) Limited JJC Acquisition Company B.V. JNTL Consumer Health I JJHC, LLC (Switzerland) GmbH JJSV Belgium BV JNTL Consumer Health II JJSV Manufacturing Malaysia SDN. BHD. (Switzerland) GmbH JJSV Norden AB JNTL Consumer Health LLC JJSV Produtos Oticos Ltda. JNTL Consumer Health Mexico, JNJ Global Business Services s.r.o. S. de R.L. de C.V. JNJ Holding EMEA B.V. JNTL Consumer Health Middle JNJ International Investment LLC East FZ-LLC JNTL (APAC) HoldCo 2 LLC JNTL HoldCo 2 LLC JNTL (APAC) HoldCo 3 Pte. Ltd. JNTL HoldCo 3 LLC JNTL (APAC) HoldCo LLC JNTL HoldCo 4 LLC JNTL (APAC) HoldCo Pte. Ltd. JNTL HoldCo 5 LLC JNTL (Japan) HoldCo Inc. JNTL HoldCo 6 LLC JNTL (Malaysia) Sdn. Bhd. JNTL HoldCo 7 LLC

JNTL HoldCo 8 LLC Johnson & Johnson Consumer Inc. JNTL HoldCo LLC Johnson & Johnson Consumer NV Johnson & Johnson Consumer JNTL Holdings 2, Inc. JNTL Holdings 3, Inc. Saudi Arabia Limited JNTL Holdings B.V. Johnson & Johnson Consumer Services JNTL Holdings, Inc. EAME Ltd. JNTL Ireland HoldCo 2 B.V. Johnson & Johnson d.o.o. JNTL Netherlands HoldCo B.V. Johnson & Johnson de Argentina S.A.C. e. I. JNTL Turkey Tuketici Sagligi Johnson & Johnson de Chile S.A. Limited Sirketi Johnson & Johnson de Colombia S.A. Johnson & Johnson Johnson & Johnson de Mexico, S.A. de C.V. Johnson & Johnson - Societa' Per Azioni Johnson & Johnson de Uruguay S.A. Johnson & Johnson (Angola), Limitada Johnson & Johnson de Venezuela, S.A. Johnson & Johnson (Australia) Pty Ltd Johnson & Johnson del Ecuador, S.A. Johnson & Johnson (Canada) Inc. Johnson & Johnson Del Paraguay, S.A. Johnson & Johnson (China) Investment Ltd. Johnson & Johnson del Peru S.A. Johnson & Johnson (Ecuador) S.A. Johnson & Johnson do Brasil Industria E Johnson & Johnson (Egypt) S.A.E. Comercio de Produtos Para Saude Ltda. Johnson & Johnson (Hong Kong) Limited Johnson & Johnson Dominicana, S.A.S. Johnson & Johnson (Ireland) Limited Johnson & Johnson Enterprise Johnson & Johnson (Jamaica) Limited Innovation Inc. Johnson & Johnson (Kenya) Limited Johnson & Johnson European Treasury Johnson & Johnson (Middle East) Inc. **Unlimited Company** Johnson & Johnson (Mozambique), Johnson & Johnson Finance Corporation Johnson & Johnson Finance Limited Limitada Johnson & Johnson (Namibia) Johnson & Johnson Financial (Proprietary) Limited Services GmbH Johnson & Johnson (New Zealand) Limited Johnson & Johnson for Export and Johnson & Johnson (Philippines), Inc. Import LLC Johnson & Johnson (Private) Limited Johnson & Johnson Gateway, LLC Johnson & Johnson (Singapore) Johnson & Johnson Gesellschaft m.b.H. Holdco LLC Johnson & Johnson GmbH Johnson & Johnson (Thailand) Ltd. Johnson & Johnson GT, Sociedad Anonima Johnson & Johnson (Trinidad) Limited Johnson & Johnson Guatemala, S.A. Johnson & Johnson (Vietnam) Co., Ltd Johnson & Johnson Health and Wellness Johnson & Johnson AB Solutions, Inc. Johnson & Johnson AG Johnson & Johnson Health Care Johnson & Johnson Bulgaria EOOD Systems Inc. Johnson & Johnson Hellas Commercial and Johnson & Johnson China Ltd. Johnson & Johnson Consumer Industrial S.A. (Hong Kong) Limited Johnson & Johnson Hellas Consumer Johnson & Johnson Consumer Products Commercial Societe Anonyme (Thailand) Limited Johnson & Johnson Hemisferica S.A. Johnson & Johnson Consumer B.V. Johnson & Johnson Holdco (NA) Inc. Johnson & Johnson Consumer Johnson & Johnson Holding GmbH

Holdings France

Johnson & Johnson Holdings Johnson & Johnson Medical S.p.A. (Austria) GmbH Johnson & Johnson Medical SAS Johnson & Johnson Inc. Johnson & Johnson Medical Johnson & Johnson Industrial Ltda. Saudi Arabia Limited Johnson & Johnson Innovation - JJDC, Inc. Johnson & Johnson Medical Taiwan Ltd. Johnson & Johnson Innovation Limited Johnson & Johnson Medical, S.C.S. Johnson & Johnson Innovation LLC Johnson & Johnson Medikal Sanayi ve Johnson & Johnson International Ticaret Limited Sirketi Johnson & Johnson MedTech Johnson & Johnson International (Singapore) Pte. Ltd. (Thailand) Ltd. Johnson & Johnson International Financial Johnson & Johnson Medtech Services Unlimited Company Colombia S.A.S. Johnson & Johnson Irish Finance Johnson & Johnson Middle East FZ-LLC Company Limited Johnson & Johnson Morocco Johnson & Johnson K.K. Societe Anonyme Johnson & Johnson Kft. Johnson & Johnson Nordic AB Johnson & Johnson Korea Selling & Johnson & Johnson Pacific Pty Limited Johnson & Johnson Pakistan Distribution LLC Johnson & Johnson Korea, Ltd. (Private) Limited Johnson & Johnson Limited Johnson & Johnson Panama, S.A. Johnson & Johnson LLC Johnson & Johnson Personal Care Johnson & Johnson Luxembourg Finance (Chile) S.A. Company Sarl Johnson & Johnson Pharmaceutical Ltd. Johnson & Johnson Management Limited Johnson & Johnson Poland Sp. z o.o. Johnson & Johnson Medical (China) Ltd. Johnson & Johnson Private Limited Johnson & Johnson Medical Johnson & Johnson Pte. Ltd. (Proprietary) Ltd Johnson & Johnson Pty. Limited Johnson & Johnson Medical (Shanghai) Ltd. Johnson & Johnson Romania S.R.L. Johnson & Johnson Medical (Suzhou) Ltd. Johnson & Johnson S.E. d.o.o. Johnson & Johnson Medical B.V. Johnson & Johnson S.E., Inc. Johnson & Johnson Medical Devices Johnson & Johnson Sante Beaute France Johnson & Johnson SDN, BHD. Diagnostics Group - Latin America, Johnson & Johnson Services, Inc. L.L.C. Johnson & Johnson Surgical Vision India Johnson & Johnson Medical GmbH **Private Limited** Johnson & Johnson Surgical Vision, Inc. Johnson & Johnson Medical Greece Single Member S.A. Johnson & Johnson Taiwan Ltd. Johnson & Johnson Medical Korea Ltd. Johnson & Johnson UK Treasury Johnson & Johnson Medical Limited Company Limited Johnson & Johnson Ukraine LLC Johnson & Johnson Medical Mexico. Johnson & Johnson Urban S.A. de C.V. Johnson & Johnson Medical NV Renewal Associates Johnson & Johnson Medical Johnson & Johnson Vision Care Products GmbH (Australia) Pty Ltd Johnson & Johnson Medical Pty Ltd Johnson & Johnson Vision Care (Shanghai) Ltd. Johnson & Johnson Medical S.A.

Johnson & Johnson Vision Care Ireland

Unlimited Company

Johnson & Johnson Vision Care, Inc.

Johnson & Johnson Vision Korea, Ltd.

Johnson & Johnson, Lda Johnson & Johnson, S.A.

Johnson & Johnson, S.A. de C.V.

Johnson & Johnson, s.r.o. Johnson & Johnson, s.r.o.

Johnson and Johnson (Proprietary) Limited Johnson and Johnson Sihhi Malzeme Sanayi

Ve Ticaret Limited Sirketi

Johnson Y Johnson de Costa Rica, S.A.

JOM Pharmaceutical Services, Inc.

Kenvue Inc.

La Concha Land Investment Corporation

McNeil AB

McNeil Consumer Pharmaceuticals Co.

McNeil Denmark ApS

McNeil Healthcare (Ireland) Limited McNeil Healthcare (UK) Limited

McNeil Healthcare LLC McNeil Iberica S.L.U. McNeil LA LLC

McNEIL MMP, LLC

McNeil Nutritionals, LLC McNeil Panama, LLC McNeil Products Limited

McNeil Sweden AB

Medical Device Business Services, Inc.

Medical Devices & Diagnostics Global Services, LLC

Medical Devices International LLC

Medos International Sarl

Medos Sarl

MegaDyne Medical Products, Inc. Menlo Care De Mexico, S.A. de C.V.

Mentor B.V.

Mentor Deutschland GmbH Mentor Medical Systems B.V. Mentor Partnership Holding

Company I, LLC Mentor Texas GP LLC Mentor Texas L.P. Mentor Worldwide LLC

Middlesex Assurance Company Limited

Momenta Ireland Limited Momenta Pharmaceuticals, Inc.

NeoStrata Company, Inc.

NeoStrata UG (haftungsbeschrankt) Netherlands Holding Company

Neuravi Limited

NeuWave Medical, Inc. Novira Therapeutics, LLC NuVera Medical, Inc.

Obtech Medical Mexico, S.A. de C.V.

OBTECH Medical Sarl
OGX Beauty Limited
OMJ Holding GmbH
OMJ Pharmaceuticals, Inc.
Omrix Biopharmaceuticals Ltd.
Omrix Biopharmaceuticals NV
Omrix Biopharmaceuticals, Inc.

Ortho Biologics LLC Ortho Biotech Holding LLC

Orthospin Ltd.
Orthotaxy SAS

Patriot Pharmaceuticals, LLC Peninsula Pharmaceuticals, LLC

Percivia LLC
Pharmadirect Ltd.
Pharmedica Laboratories
(Proprietary) Limited

preCARDIA. Inc.

Princeton Laboratories, Inc. Productos de Cuidado Personal y

de La Salud de Bolivia S.R.L.

Proleader S.A. Prosidyan, Inc.

PT Integrated Healthcare Indonesia PT Johnson & Johnson Indonesia

PT Johnson and Johnson Indonesia Two

Pulsar Vascular, Inc.

Regency Urban Renewal Associates

RespiVert Ltd.

Review Manager Test Entity 2

Royalty A&M LLC Rutan Realty LLC

Scios LLC

Serhum S.A. de C.V.

Shanghai Elsker Mother & Baby Co., Ltd

Shanghai Johnson & Johnson Ltd.

Shanghai Johnson & Johnson Pharmaceuticals Ltd.

Sodiac ESV

Spectrum Vision Limited Liability Company

Spectrum Vision Limited Liability

Partnership

SterilMed, Inc.

Surgical Process Institute

Deutschland GmbH

Synthes Costa Rica S.C.R., Limitada

SYNTHES GmbH

Synthes GmbH

Synthes Holding AG

Synthes Holding Limited

SYNTHES Medical Immobilien GmbH

Synthes Medical Surgical Equipment &

Instruments Trading LLC

Synthes Produktions GmbH

Synthes Proprietary Limited

Synthes S.M.P., S. de R.L. de C.V.

Synthes Tuttlingen GmbH

Synthes USA Products, LLC

Synthes USA, LLC

Synthes, Inc.

TARIS Biomedical LLC

TearScience, Inc.

The Anspach Effort, LLC

The Vision Care Institute, LLC

Tibotec, LLC

Torax Medical, Inc.

UAB "Johnson & Johnson"

Vania Expansion

Verb Surgical Inc.

Vision Care Finance Unlimited Company

Vogue International LLC

WH4110 Development Company, L.L.C.

Xian Janssen Pharmaceutical Ltd.

XO1 Limited

Zarbee's, Inc.

Managers and Officers of the Debtor

John Kim

Richard Dickinson

Robert Wuesthoff

Russell Deyo

Major Current Business Affiliations of

Debtor's Managers

American Foundation for Opioid

Alternatives

Migration Policy Institute

Miller Center for Community Protection &

Reliance, Eagleton Institute of Politics,

Rutgers University

National Center for State Courts

National Council, McLean Hospital

One Mind

Depository and Disbursement Banks

Bank of America, N.A.

Major Sureties

Chubb

Federal Insurance Company

Liberty Mutual Insurance Company

Travelers Casualty and Surety Company of America

Parties to Material Contracts With the Debtor

Johnson & Johnson

Johnson & Johnson Holdco (NA) Inc.

Johnson & Johnson Services, Inc.

Significant Co-Defendants in

Talc-Related Litigation

3M Company

A.O. Smith Corporation

Albertsons Companies, Inc.

Avon Products, Inc.

Barretts Minerals, Inc.

BASF Catalysts LLC

Block Drug Company, Inc.

Borg Warner Morse Tec, Inc.

Brenntag North America

Brenntag Specialties, Inc.

Bristol-Myers Squibb Company

Carrier Corporation

Chanel, Inc.

Charles B. Chrystal Co., Inc.

Chattem, Inc.

Colgate-Palmolive Company

Conopco Inc.

Costco Wholesale Corporation

Coty, Inc. Crane Co.

CVS Health Corporation CVS Pharmacy, Inc.

Cyprus Amax Minerals Company

Cyprus Mines Corporation Dana Companies, LLC DAP Products, Inc.

Dollar General Corporation

Duane Reade Inc.
Eaton Corporation
Eli Lilly and Company
Elizabeth Arden, Inc.
Estee Lauder Inc.

Family Dollar Stores Inc.

Flowserve US, Inc. FMC Corporation

Food 4 Less of California, Inc.

Ford Motor Company Foster Wheeler, LLC Gardner Denver, Inc. General Electric Company Genuine Parts Company Goodyear Tire & Rubber Co.

Goulds Pumps, LLC

Grinnell LLC

Honeywell International, Inc. Imerys Talc America, Inc.

Imerys USA, Inc. IMO Industries Inc. John Crane, Inc.

K&B Louisiana Corporation Kaiser Gypsum Company, Inc.

Kmart Corporation Kolmar Laboratories

Longs Drug Stores California

L'Oreal USA, Inc. Lucky Stores, Inc.

Macy's, Inc. Mary Kay Inc. Maybelline LLC

Metropolitan Life Insurance Company

Noxell Corporation

Personal Care Products Council

Pfizer, Inc.

Pharma Tech Industries, Inc.

Pneumo Abex, LLC PTI Royston, LLC

Publix Super Markets, Inc.

R.T. Vanderbilt Holding Company, Inc.

Ralphs Grocery Company

Revlon Consumer Products Corporation

Revlon, Inc.

Rite Aid Corporation

Safeway, Inc.

Sanofi-Aventis U.S. LLC

Shulton, Inc.

Specialty Minerals Inc. Target Corporation

The Dow Chemical Company
The Estee Lauder Companies, Inc.

The Kroger Co.

The Procter & Gamble Company

Thrifty Payless, Inc.

Unilever Home & Personal Care USA

Union Carbide Corporation Vanderbilt Minerals, LLC

ViacomCBS, Inc. Walgreen Co. Walmart, Inc.

Warren Pumps, LLC

Whittaker Clark & Daniels, Inc.

Wyeth Holdings LLC

Yves Saint Laurent America, Inc.

Debtor's Proposed Professionals and

Claims Agent

AlixPartners LLP
Bates White LLC

Blake, Cassels & Graydon LLP Epiq Corporate Restructuring LLC

Hogan Lovells Jones Day

King & Spalding LLP McCarter & English, LLP

Orrick, Herrington, & Sutcliffe, LLP

Shook, Hardy & Bacon L.L.P.

Skadden, Arps, Slate, Meager & Flom LLP

Weil Gotshal & Manges LLP Wollmuth Maher & Deutsch LLP

<u>Debtor's Proposed Significant Ordinary</u> <u>Course Professionals, Consultants and</u> <u>Service Providers</u>

Adler Pollock & Sheehan PC Barrasso Usdin Kupperman

Freeman & Sarver, L.L.C.

Blank Rome LLP Butler Snow LLP Carlton Fields, P.A.

Chehardy, Sherman, Williams,

Recile, & Hayes

Damon Key Leong Kupchak Hastert

Davis Hatley Haffeman & Tighe

Dechert LLP

Elliott Law Offices, PA

Faegre Drinker Biddle & Reath LLP

Foliart, Huff, Ottaway & Bottom

Gibson, Dunn & Crutcher LLP

Goldman Ismail Tomaselli Brennan &

Baum

Hartline Barger

HeplerBroom LLC

Irwin Fritchie Urquhart & Moore LLC

Johnson & Bell Ltd.

Jones, Skelton & Hochuli, P.L.C.

Kaplan, Johnson, Abate & Bird LLP

Kelley Jasons McGowan Spinelli

Hanna & Reber, LLP

Kirkland & Ellis LLP

Kitch Drutchas Wagner

Valitutti & Sherbrook

Lewis Brisbois Bisgaard & Smith, LLP

Manion Gaynor & Manning LLP

Manning Gross + Massenburg

Miles & Stockbridge

Milligan & Herns

Morgan Lewis

Nelson Mullins Riley & Scarborough, LLP

Nutter McClennen & Fish LLP

Patterson Belknap Webb & Tyler LLP

Proskauer Rose LLP

Quattlebaum, Grooms & Tull PLLC

Schnader Harrison Segal & Lewis

Schwabe Williamson & Wyatt

Sills Cummis & Gross P.C.

Stoel Rives LLP

Sullivan Whitehead & Deluca LLP

Swartz Campbell LLC

The Weinhardt Law Firm

Tucker Ellis LLP

Willcox & Savage, P.C.

Known Professionals for Certain

Non-Debtor Parties in Interest

Barnes & Thornburg, LLP

Cravath, Swaine & Moore

White & Case LLP

Proposed Future Claimants'

Representative and Her Proposed

Professional

Randi S. Ellis

Walsh Pizzi O'Reilly Falanga LLP

Material Potentially Indemnified Parties

Bausch Health Companies Inc.

Cyprus Mines Corporation

Cyprus Talc Corp.

Imerys Talc America, Inc.

Imervs Talc Vermont, Inc.

Luzenac America, Inc.

Pharma Tech Industries, Inc.

PTI Royston, LLC

Rio Tinto America, Inc.

RTZ America, Inc.

Valeant Pharmaceuticals International, Inc.

Windsor Minerals Inc.

Costco Wholesale Corporation

Publix Super Markets, Inc.

Rite Aid Corporation

Safeway Inc.

Walmart Inc.

Parties Who Have Entered Into Plan

Support Agreements

Andres Pereira Firm

Ferrer, Poirot & Wansbrough

Johnson Law Group

Liakos Law, APC

Linville Law Group

McDonald Worley

Nachawati Law Group

OnderLaw, LLC

Pulaski Kherkher PLLC Rueb Stoller Daniel, LLP Seeger Weiss LLP Slater Slater Schulman LLP Trammell PC Watts Guerra LLP Wisner Baum, LLP

Law Firms with Significant Representations of Talc Claimants

Andres Pereira Firm Arnold & Itkin LLP Aylstock, Witkin, Kreis &

Overholtz, PLLC

Beasley Allen Law Firm

Childers, Schlueter & Smith LLC

Ferrer, Poirot & Wansbrough

Johnson Law Group Linville Law Group McDonald Worley Miller Firm, LLC Nachawati Law Group

Napoli Shkolnik PLLC

OnderLaw, LLC

Pulaski Kherkher PLLC Robinson Calcagnie Rueb Stoller Daniel, LLP

Sanders, Phillips, Grossman, LLC

Seeger Weiss LLP

Slater Slater Schulman LLP

Trammell PC Wagstaff Law Firm Watts Guerra LLP Wisner Baum, LLP

Key Parties in *Imerys Talc America*, *Inc.* and Cyprus Mines Corp. Chapter 11 Cases

Cyprus Amax Minerals Company

Cyprus Mines Corporation Cyprus Talc Corporation

Imerys S.A.

Imerys Talc America, Inc. Imerys Talc Vermont, Inc. (fka Windsor Minerals Inc.)

James L. Patton

Luzenac America, Inc.

Official Committee of Tort Claimants

(In re Imerys Talc America, Inc.) Official Committee of Tort Claimants (In re Cyprus Mines Corp.) Roger Frankel

Debtor's Insurers

A.G. Securitas

ACE Property & Casualty Insurance Company

Aetna Casualty and Surety Company

Affiliated FM Ins. Company

AIG Europe S.A.

AIG Property and Casualty Company

AIU Ins. Company Allianz Global Risks US **Insurance Company** Allianz Ins. Company

Allstate Insurance Company

American Centennial Ins. Company American Motorists Ins. Company American Re-Insurance Company **Arrowood Indemnity Company** ASR Schadeverzekering N.V.

Assurances Generales De France Assurantiekantoor VanWijk & Co.

Atlanta International Insurance Company

Birmingham Fire Ins. Company of

Pennsylvania

Central National Ins. Company of Omaha

Century Indemnity Company Champion Dyeing Allocation Year Chubb

City Ins. Company

Colonia Versicherungs AG, Koln

Company of N.Y.

Continental Insurance Company Darag Deutsche Versicherungs-Und Drake Ins. Company of New York Employers Ins. Company of Wausau

Employers Ins. of Wausau

Employers Mutual Casualty Company

Eurinco Allgemeine

Everest Reinsurance Company Fireman's Fund Ins. Company First State Ins. Company

GAP

Gibraltar Casualty Company

Granite State Ins. Company

Great American

Great Northern Ins. Company

Great Southwest Fire Ins. Company

Groupe Drouot

Harbor Ins. Company

Hartford Accident and Indemnity Company

Home Ins. Company

Ideal Mutual Ins. Company

Industrial Indemnity Company

Ins. Company of North America

Ins. Company of the State of Pennsylvania

Ins. Corporation of Singapore Limited

Integrity Ins. Company International Ins. Company

International Surplus Lines Ins. Company

Lexington Ins. Company

London Guarantee and Accident

L'Union Atlantique S.A. d'Assurances

Maas Lloyd

Mead Reinsurance Corporation

Middlesex Assurance Company

Midland Ins. Company

Midstates Reinsurance Corp.

Mission Ins. Company

Mission National Ins. Company

Munich Reinsurance America, Inc.

Mutual Fire, Marine, & Inland Ins.

Company

N.V. De Ark

N.V. Rotterdamse Assurantiekas

N.V. Schadeverzekeringsmaatschappij

National Casualty Company

National Union Fire Ins. Company of

Pittsburgh, PA

Nationwide

New Hampshire Ins. Company

North River Ins. Company

Northbrook Excess and Surplus

Ins. Company

Northeastern Fire Ins. Company

of Pennsylvania

Pacific Employers Ins. Company

ProSight

Prudential Reinsurance Company

Puritan Insurance Company

Republic Indemnity Company of America

Republic Ins. Company

Republic Western Ins. Company

Repwest Insurance Company

Resolute Management Inc.

Rheinland Versicherungen

Rheinland Verzekeringen

Riverstone Insurers

Royal Belge I.R., S.A. d'Assurances

Royal Indemnity Company

Royal Ins. Company

Ruckversicherungs-AG

Safety Mutual Casualty Corporation

Safety National Casualty Corporation

Seguros La Republica SA

Sentry Insurance A Mutual Company

Southern American Ins. Company

Starr Indemnity & Liability Company

TIG Insurance Company

Transamerica Premier Insurance Company

Transit Casualty Company

Travelers Casualty and Surety Company

UAP

Union Atlantique d'Assurances S.A.

Union Indemnity Ins. Company

of New York

Versicherungs AG, Dusseldorf

Westchester Fire Insurance Company

Westport Insurance Corporation

XL Ins. Company

Potential Parties in Canadian Proceeding

Cassels Brock & Blackwell LLP

Ernst & Young Inc

States/Federal District With Consumer Protection Investigations/Actions

Alabama

Alaska

Arkansas

Arizona

Colorado

Connecticut

Delaware

Florida

Georgia

Hawaii

Idaho
Illinois
Iowa
Kansas
Kentucky
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Montana

New Hampshire New Jersey New Mexico New York North Carolina North Dakota

Nebraska

Nevada

Ohio Oklahoma Oregon Rhode Island South Dakota

Texas
Utah
Vermont
Virginia
Washington
Washington, D.C.
West Virginia
Wisconsin

The Office of the United States Trustee Region 3 - District of New Jersey

Adam Shaarawy Adela Alfaro Alexandria Niko

Alexandria Nikolinos Angeliza Ortiz-Ng Daniel C. Kropiewnicki

David Gerardi

Fran B. Steele

Francyne D. Arendas

James Stives Jeffrey Sponder Joseph C. Kern Kirsten K. Ardelean Lauren Bielskie Maggie McGee Martha Hildebrandt Michael Artis Neidy Fuentes Peter J. D'Auria

Robert J. Schneider, Jr.

Tia Green Tina L. Oppelt William J. Ziemer

Bankruptcy Judges for the District of

New Jersey

Judge Andrew B. Altenburg, Jr. Judge Christine M. Gravelle Judge Jerrold N. Poslusny, Jr. Judge John K. Sherwood Judge Kathryn C. Ferguson Judge Michael B. Kaplan Judge Rosemary Gambardella Judge Stacey L. Meisel Judge Vincent F. Papalia

Retailers and Indemnified Parties

7-Eleven, Inc. Acme Markets, Inc. Ahold Delhaize USA

Ahold Delhaize USA, Inc. Albertsons Companies, Inc.

Alpha Beta Company

Associated Wholesaler Grocers, Inc.

Bartell Drug Company

Bashas', Inc.

Bausch Health US, LLC Bausch Health Americas, Inc. Bausch Health Companies Inc.

BCW LLC

Best Market of Astoria, Inc.

BI-LO, LLC

Bi-Mart Corporation C&S Wholesale Grocers C&S Wholesale Grocers, Inc. Classic Pharmacy, Inc.

Cosentino Enterprises, Inc. Cosentino Group, Inc. Cosentino Price Chopper Cosentino's Food Stores

Costco Wholesale Corporation

CVS Health Corporation

CVS Pharmacy, Inc.

Demoulas Super Markets, Inc.

Dierbergs Markets, Inc.

Discount Drug Mart, Inc.

Dollar Tree Stores, Inc.

DRI I, Inc.

Duane Reade, Inc.

Eckerd Corporation of Florida, Inc.

Family Dollar Stores

Fleming Companies, Inc.

Food 4 Less of California

Food 4 Less of Southern California, Inc.

Foodland

Foodland Super Market, LTD

Foot Locker Specialties, Inc., individually and as successor-in-interest to F.W.

Woolworth Co.

Foot Locker Specialty, Inc.

Foot Locker, Inc./Woolworth Corporation

Four B Corporation d/b/a Balls Food Stores

Fred Meyer Stores, Inc.

Fruth Pharmacy, Inc.

Gerlands Food Fair, LLC

Gerlands, LLC

Gerlands, LLC/Lewis Food Town, Inc.

Giant Eagle, Inc.

Giant Food of Maryland, LLC

Giant Food Stores, LLC

Grocery Outlet Holding Corporation

Grocery Outlet Inc.

Grocery Outlet, Inc.

HAC, Inc.

H-E-B, LP

Hughes Markets, Inc.

Hy-Vee, Inc.

Jewel Food Stores

Jewel Osco

Jewel Osco Southwest

K&B Corporation

K&B Louisiana Corporation

Kings Park Slope, Inc.

Kings Pharmacy

Kings Pharmacy Holdings, LLC

Kings Third Ave. Pharmacy, Inc.

Knorr Street ShopRite, Inc.

La Luz Market, LTD. Co.

Lewis Food Town, Inc.

Longs Drug Stores California, L.L.C

Longs Drug Stores of Southern California,

L.L.C.

Longs Drug Stores, L.L.C.

Lucky Stores, Inc.

Marc Glassman Inc.

Marc Glassman, Inc. d/b/a Marc's Store &

Pharmacy

MBF Healthcare Holdings, Inc.

MBF Healthcare Management, LLC

Meijer, Inc.

MMG Equity Partners

Navarro Discount Pharmacies No. 5, LLC

Navarro Discount Pharmacies, LLC

Owens & Minor Distribution, Inc.

Owens & Minor, Inc.

Piggly Wiggly Carolina Co.

Piggly Wiggly Carolina Co., Inc.

Piggly Wiggly Companies, Inc.

Piggly Wiggly, LLC

Piggly Wiggly, LLC (subsidiary of C&S

Wholesale Grocers)

PTI

PTI Royston LLC, a Georgia Limited

Liability Co., d/b/a Pharma Tech

Industries

PTI Union, LLC d/b/a Pharma Tech

Industries

Publix Super Markets, Inc.

Raley's

Ralphs Grocery Company

Randall's Food & Drug LP

Randall's Food Markets, Inc.

Rite Aid

Rite Aid Corporation

Rite Aid Hdgtrs. Corp.

Rite Aid of New York City, Inc.

Rite Aid of New York, Inc.

Rite Aid of Pennsylvania, Inc.

Rite Aid of South Carolina, Inc.

Rouse's Enterprises, L.L.C.

Rouse's Enterprises, L.L.C. d/b/a Rouses

Market

Safeway Inc.

Save Mart Supermarkets, Inc.

Save Mart Supermarkets, Inc./Lucky Stores

Schnuck Markets

Schnuck Markets, Inc.

Sedano's Market, Inc.

Shanti Pharmacy Corp.

Shaw's Supermarkets, Inc.

Shop-Rite Supermarkets, Inc. a/k/a Shop

Rite of Knorr Street

Smith Food and Drug Center, Inc.

Southeastern Grocers, Inc.

Star Markets Company, Inc.

Stater Bros. Markets

Super Center Concepts, Inc. d/b/a Superior

Grocers

Superior Grocers

SuperValu, Inc.

T. Levy Associates, d/b/a Beauty Land

Enterprises

T. Levy Associates, Inc. d/b/a Beauty Land

Enterprises/Beautyland

Target Corporation

The Bartell Drug Company

The Kroger Company

The Stop & Shop Supermarket Company

LLC

The Vons Companies, Inc.

Thrifty Payless, Inc.

Thrifty white Drug

Tops Holding, LLC

Valeant Pharmaceuticals International

Valeant Pharmaceuticals International, Inc.

Valeant Pharmaceuticals North America

LLC

Wakefern Food Corp.

Walgreen Co.

Walgreen Eastern Co., Inc.

Walgreen Pharmacy Strategies, LLC

Walgreens Boots Alliance, Inc.

Walmart Inc.

Wegmans Food Markets, Inc.

Winn-Dixie Stores, Inc.

Woolworth Corporation

Top 30 Law Firms

Andrew & Thorton

Ashcraft & Gerel, LLP

Alystock, Witkin, Kreis & Overholtz, PLLC

Barnes Firm

Beasley Allen Law Firm

Childers, Schlueter & Smith LLC

Cellino Law LLP

Driscoll Firm, LLC

Golomb Spirit Grunfeld, P.C.

Johnson Becker PLLC

Johnson Law Group

Lenze Lawyers, PLC

McDonald Worley

Miller Firm, LLC

Morelli Law Firm

Motley Rice LLC

Nachawati Law Firm

Napoli Shkolnik PLLC

Onder Law, LLC

Pulaski Kherkher PLLC

Robinson Calcagnie

Rueb Stoller Daniel, LLP

Sanders, Phillips

Simmons Hanly Conroy LLC

Slater Slater Schullman, LLP

Trammel PC

Wagstaff Law Firm

Watts Guerra LLP

Williams Hart Law Firm

<u>Top 20 Largest Unsecured Claims</u> (Excluding Insiders)

Douglas Barden Shawn Johnson Christina Prudencio Ashley Schmitz FTI Consulting, Inc. Brown Rudnick LLP MoloLamken LLP

Walsh Pizzi O'Reilly Falanga LLP

Genova Burns LLP

Houlihan Lokey Capital, Inc.

Miller Thomson LLP Massey & Gail LLP CRA International, Inc. Anderson Kill P.C.

Berkeley Research Group LLC Bernstein Shur Sawyer & Nelson P.A.

Lighthouse Technologies, Inc. Cassels Brock and Blackwell LLP

Albert Schwenk

Committee Members

Rebecca Love c/o Ashcraft & Gerel, LLP Attn: Michelle Parfitt

Tonya Whetsel c/o Karst von Oiste LLP Attn: Eric Karst

William A. Henry c/o Levin Papantonio Rafferty Attn: Christopher Tisi

Patricia Cook c/o Weitz & Luxenberg, P.C. Attn: Danny Kraft

Alishia Landrum c/o Beasley Allen Law Firm Attn: Leigh O'Dell Blue Cross Blue Shield of Massachusetts c/o Hill Hill Carter Franco Cole & Black, PC

Attn: Elizabeth Carter

Kristie Doyle c/o Kazan, McClain, Satterley & Greenwood PLC Attn: Steven Kazan

Randy Derouen c/o Levy Konigsberg LLP Attn: Audrey Raphael

April Fair c/o Robinson Calcagnie, Inc. Attn: Mark Robinson, Jr.

Brandi Carl c/o Golomb Spirt Grunfeld Attn: Richard Golomb

Sue Sommer-Kresse c/o Motley Rice, LLC Attn: Daniel Lapinski Case 23-12825-MBK Doc 401-1 Filed 05/03/23 Entered 05/03/23 15:36:28 Desc Certification in Support of Application for Retention of Professional Otterbour Page 31 of 37

Schedule 2 Client Data List

Client Data List

Current Otterbourg Clients

Client Name	Potentially Interested Parties	Potentially Interested Parties' Relationship to the Debtor
Bank of America, N.A.	Bank of America, N.A.	Bank account

<u>Client Name</u>	Potentially Interested Parties	Potentially Interested Parties' Relationship to the Debtor
Ad Hoc Group of Certain Talc	Ad Hoc Group of Certain Talc	Representative of certain talc
Claimants	Claimants	claimants
Members:		
Alishia Landrum (represented)		
by Beasley Allen Law Firm)		
Rebecca Love (represented by		
Ashcraft & Gerel, LLP)		
Blue Cross Blue Shield of		
Massachusetts		
Tonya Whetsel (represented by Karet was Oista LLP)		
Karst von Oiste LLP)		
 Kristie Doyle (represented by Kazan, McClain, Satterley & 		
Greenwood PLC)		
 William A. Henry (represented 		
by Levin Papantonio Rafferty)		
 Randy Derouen (represented by 		
Levy Konigsberg LLP)		
April Fair (represented by		
Robinson Calcagnie, Inc.)		
Patricia Cook (represented by		
Weitz & Luxenberg, P.C.)		
(April 4-15, 2023; representation		
immediately ceased upon		
Otterbourg's selection as co-		
counsel to the official committee of		
talc claimants appointed in Debtor's		
second bankruptcy case, Case No.		
23-12825)		

<u>Client Name</u>	Potentially Interested Parties	Potentially Interested Parties' Relationship to the Debtor
Official Committee of Talc	Official Committee of Talc	Representative of talc claimants
Claimants	Claimants	
3.6		
Members:		
 Rebecca Love (represented by Ashcraft & Gerel, LLP) 		
 Alishia Landrum (represented by Beasley Allen Law Firm) 		
 Kellie Brewer (represented by Fears Nachawati Law Firm) 		
Blue Cross Blue Shield of Massachusetts		
 Tonya Whetsel (represented by Karst von Oiste LLP) 		
 Kristie Doyle (represented by Kazan, McClain, Satterley & Greenwood PLC) 		
• William A. Henry (represented		
by Levin Papantonio Rafferty)Randy Derouen (represented by		
Levy Konigsberg LLP)		
 Darlene Evans (represented by OnderLaw, LLC) 		
 April Fair (represented by 		
Robinson Calcagnie, Inc.)		
 Patricia Cook (represented by Weitz & Luxenberg, P.C.) 		
(Appointed per Order dated November 8, 2021 and reinstated effective April 12, 2022 in Debtor's first bankruptcy case, Case No. 21- 30589, at Dkt. Nos. 355, 1273; representation ceased on April 4, 2023 upon its dissolution pursuant to Order dismissing the Debtor's		
first bankruptcy case, Case No. 21-30589, at Dkt. Nos. 3938, 3939)		

<u>Client Name</u>	Potentially Interested Parties	Potentially Interested Parties' Relationship to the Debtor
Official Committee of Talc	Official Committee of Talc	Representative of ovarian cancer
Claimants I	Claimants I	claimants
Members:		
 Kellie Brewer (represented by Fears Nachawati Law Firm) 		
Blue Cross Blue Shield of Massachusetts		
Brandi Carl (represented by		
Golomb Spirt Grunfeld)Shirleeta Ellison (represented by Motley Rice)		
 Darlene Evans (represented by OnderLaw, LLC) 		
 April Fair (represented by Robinson Calcagnie, Inc.) 		
• William A. Henry (represented		
by Levin Papantonio Rafferty)		
 Alishia Landrum (represented 		
by Beasley Allen Law Firm)		
• Rebecca Love (represented by		
Ashcraft & Gerel, LLP)		
(Appointed per Notice of the United		
States Trustee's Filing of		
Reconstituted and Amended: (i)		
Notice of Appointment of Official		
Committee of Talc Claimants I; and		
(ii) Notice of Appointment of		
Official Committee of Talc Claimants II filed on December 23,		
2021 in Debtor's first bankruptcy		
case, Case No. 21-30589, at Dkt.		
No. 965; representation ceased		
upon the disbandment of the		
Official Committee of Talc		
Claimants I and reinstatement of the		
original committee on April 12,		
2022)		

<u>Client Name</u>	Potentially Interested Parties	Potentially Interested Parties' Relationship to the Debtor
Seeger Weiss LLP (2022; representation immediately ceased upon Otterbourg's selection as co-counsel to the Official Committee of Unsecured Creditors for Tort Claimants – Related to Use of Combat Arms Version 2 Earplugs appointed in the bankruptcy cases of Aearo Technologies LLC, et al., pending	Seeger Weiss LLP	Plaintiffs Law Firm; Party identified by the Debtor as having allegedly entered into a plan support agreement
in the United States Bankruptcy Court for the Southern District of Indiana, Case No. 22-02890)		
Plaintiffs' Steering Committee (2021; representation immediately ceased upon Otterbourg's selection as co-counsel to the official committee of talc claimants appointed in Debtor's first bankruptcy case, Case No. 21-30589)	Plaintiffs' Steering Committee	Representative of Certain Claimants in the In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation (MDL No. 2738) before the United States District Court for the District of New Jersey
Beasley Allen Law Firm (2021; representation immediately ceased upon the PSC's retention of Otterbourg as counsel in Debtor's first bankruptcy case, Case No. 21-30589)	Beasley Allen Law Firm	Plaintiffs Law Firm

<u>Client Name</u>	Potentially Interested Parties	Potentially Interested Parties' Relationship to the Debtor
Attorney General for the State of Texas	Texas	Disclosed to the extent relevant to the State of Texas, which has been identified by the Debtor as one of
(2019)		the governmental authorities conducting investigations into unfair business practices and consumer protection violations.
XL Insurance America Co. (2018; limited engagement with no billings)	XL Ins. Company	Alleged insurer
Liberty Mutual Insurance Company (2010)	Liberty Mutual Insurance Company	Alleged major surety